

From: [Walzer, Thomas](#)
To: [Moore, Gary](#)
Subject: RE: CES Chemical Spill Tables
Date: Wednesday, November 12, 2014 10:13:22 AM
Attachments: [removed.txt](#)

My apologies I did not see any markups, except for the TCEQ comment, on the waste table and so did not look at it closely. The conversion factor was wrong and I am working on repairing that. When would the best time to call you be?



Thomas Walzer

Principal Project Scientist

Weston Solutions, Inc.

an employee-owned company

5599 San Felipe, Suite 700

Houston, Texas 77056

(713) 985.6741 Direct

(713) 705.1467 Cell

(713) 985.6703 Fax

t.a.walzer@westonsolutions.com

From: Moore, Gary [mailto:Moore.Gary@epa.gov]

Sent: Tuesday, November 11, 2014 5:35 PM

To: Walzer, Thomas

Subject: Re: CES Chemical Spill Tables

Tom:

I don't think the conversions for the TCLP Regulatory Values have been done correctly (ie. Lindane 0.4 mg/l = 400 ug/l) the Weston Conversion is 0.4 mg/l = 0.0004 ug/l). We need to talk.

Thanks

Gary Moore

Federal On-Scene Coordinator

U.S. EPA Region 6

214-789-1627 cell

214-665-6609 office

moore.gary@epa.gov

From: Walzer, Thomas <T.A.Walzer@WestonSolutions.com>

Sent: Tuesday, November 11, 2014 2:50 PM

To: Moore, Gary

Cc: Crow, David; c.shappee@westonsolutions.com; Thibodeaux, Denece

Subject: CES Chemical Spill Tables

Gary;

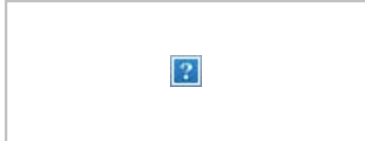
The differences in the TRRP values were we reported the TRRP 2012 values rounded to 3 significant digits. The 2012 tables were formatted to show 2 significant digits, however the tables did not use significant digits and our choice of 3 significant digits caused some apparent discrepancies. The TRRP 2014 tables were issued 10 September 2014 which rounds everything to 2 significant digits and so the numbers that appear on their tables are what they are actually using and not a value with hidden decimal places. This was issued 7 days before we did the tables on the 17th. We have redone the tables using the 2014 TRRP to remove that discrepancy.

delta-BHC (CAS No. 319-86-8) is on the RBEL tables as "Delta hexachlorocyclohexane (HCH)" (CAS No. 319-86-8), I changed our table to list the compound as "delta-BHC (delta-Hexachlorocyclohexane (HCH))" to avoid confusion and will leave the comparison value. Alternate chemical naming systems do cause a bit of trouble. For other analytes where they commented on the name I added the name as it appeared on the RBEL list in parentheses as clarification. Should we in the future include the CAS numbers on these tables?

The 3&4-methylphenol is a mixed isomer and does not have a RBEL. We took the TCEQ comment as

an instruction to use the RBEL for 4-methylphenol since that is lower than the RBEL for 3-methylphenol.

The comment identifying 2 analytes as PAH's and not SVOCs was not addressed as PAH's are usually considered subset of SVOCs. There are 100s of PAHs the attached EPA lists 28 (21 and 7 that are also priority pollutants). None of them are the two identified by the TCEQ comments: 1-Methylnaphthalene and 2-Methylnaphthalene. As an alternative we could just say Analytes by 8270. For the Waste analytical data the Comment from the TCEQ was "No TCEQ Standards or Levels included on this table." We did not use any TCEQ values because we did not know of any. Does the TCEQ have screening levels and want some of theirs added or is this just to signify they did not check and the reason why. Do they have screening levels want them added? what are they?



Thomas Walzer

Principal Project Scientist

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5599 San Felipe, Suite 700

Houston, Texas 77056

(713) 985.6741 Direct

(713) 705.1467 Cell

(713) 985.6703 Fax

t.a.walzer@westonsolutions.com

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